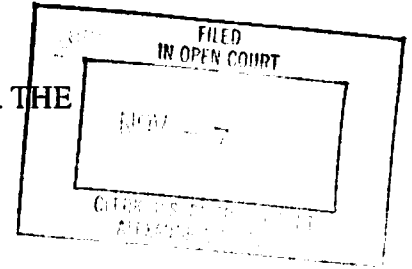


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

MOHAMMAD SABIR,

Defendant.

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)

Criminal No. 1:13cr 427

Counts 1-3: 18 U.S.C. §1001
False Statements

INDICTMENT

November 2013 TERM -- AT ALEXANDRIA

False Statements

THE GRAND JURY CHARGES THAT:

On or about the following dates, in New York City in the Eastern District of New York, defendant MOHAMMAD SABIR did knowingly and willfully make material false and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States. In particular, SABIR told agents of the Federal Bureau of Investigation that were conducting an investigation that:

<u>Count</u>	<u>Date</u>	<u>False and Fraudulent Statement</u>
1	August 12, 2010	Neither SABIR nor the mosque of which he was a leader ever provided donations to Syed Ghulam Nabi Fai or the Kashmiri American Council
2	July 19, 2011	Neither SABIR nor the mosque of which he was a leader ever gave anyone more than \$5,000 in cash.
3	October 16, 2012	The amounts that SABIR collected for the Kashmiri American Council through the mosque of which he was a leader never exceeded \$3,000 in any one year.

The statements and representations specified above were material to an investigation in the Eastern District of Virginia because agents of the Federal Bureau of Investigation and the Internal Revenue Service in this district were investigating between 2010 and 2012 the sources of monies that were received and/or disbursed by Syed Ghulam Nabi Fai and the Kashmiri American Council. They were false and fraudulent in that, as SABIR well knew, he gave or caused his mosque to give at least \$73,000 in cash to Fai and/or the Kashmiri American Council between 2004 and 2009.

(In violation of Title 18, United States Code, Section 1001(a)(2) and 2.)


A TRUE BILL:

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

FOREPERSON OF THE GRAND JURY

Dana Boente
Acting United States Attorney

By:


Gordon D. Kromberg
Assistant United States Attorney

Allison Ickovic
Special Assistant United States Attorney

John T. Gibbs
Trial Attorney
United States Department of Justice